

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

STEPHANIE DE ANGELIS, )  
                            )  
                            Plaintiff, )  
v.                        )                             Case No. 2:17 cv 985  
                            )  
CG CONSULTING, LLC, et al., )  
                            )  
                            Defendants. )

**STIPULATION OF VOLUNTARY DISMISSAL**

Pursuant to Fed. R. Civ. Pro. 41(a)(1)(A)(ii), Plaintiff, STEPHANIE DE ANGELIS, and Defendants, CG CONSULTING, LLC, HOUSTON KP, LLC, ZIGOT, LLC, POLEKATZ GENTLEMEN'S CLUB, LLC, MARSHALL INTERNATIONAL, LLC, PERA ODISHOO, ANTHONY QUARANTA, STEPHEN DABROWSKI, and NICHOLAS CASTALDO, through their undersigned attorneys, hereby stipulate to a dismissal of this action *with prejudice* as to Plaintiff's individual claims, and *without prejudice* as to the claims of the putative class members, with each side to bear its own costs and attorneys' fees, unless otherwise provided for. No notice to the putative class is required as no class has been certified in this action.

So agreed to this 7<sup>th</sup> day of August, 2018.

/s/ Steven C. Babin, Jr.

Steven C. Babin, Jr. (0093584)

Lance Chapin (0069473)

Chapin Legal Group, LLC

580 South High Street, Suite 330

Columbus, Ohio 43215

Telephone: 614.221.9100

Facsimile: 614.221.9272

[steven.babin@chapinlegal.com](mailto:steven.babin@chapinlegal.com)

[lance.chapin@chapinlegal.com](mailto:lance.chapin@chapinlegal.com)

Attorneys for Plaintiff

Stephanie De Angelis, et al.

/s/ Sara S. Zorich

Michelle L. Casper (0091321)

Jeffrey A. Risch (Pro hac vice)

Molly A. Arranz (Pro hac vice)

Sara S. Zorich (Pro hac vice)

SmithAmundsen, LLC

150 N. Michigan Ave., Suite 3300

Chicago, IL 60601

312-894-3200

312-894-3210 (fax)

[mcasper@salawus.com](mailto:mcasper@salawus.com)

[jrisch@salawus.com](mailto:jrisch@salawus.com) (Pro Hac Vice)

[marranz@salawus.com](mailto:marranz@salawus.com) (Pro Hac Vice)

[szorich@salawus.com](mailto:szorich@salawus.com) (Pro Hac Vice)

*Counsel for Defendants CG Consulting, LLC, Houston KP, LLC, Zigot, LLC, Nicholas Castaldo, and Anthony Quaranta*

/s/ Anne E. Duprey

Catherine F. Burgett (0082700)

Anne E. Duprey (0087798)

FROST BROWN TODD LLC

10 West Broad Street, Suite 2300

Columbus, Ohio 43215

Telephone: (614) 464-1211

Facsimile: (614) 464-1737

[cburgett@fbtlaw.com](mailto:cburgett@fbtlaw.com)

[aduprey@fbtlaw.com](mailto:aduprey@fbtlaw.com)

*Counsel for Pera Odishoo and Marshall International, LLC*

/s/ Tyler B. Pensyl

Tyler B. Pensyl (0080649)

Michael J. Ball (0084150)

VORYS, SATER, SEYMOUR AND PEASE LLP

52 East Gay Street, P.O. Box 1008

Columbus, Ohio 43216-1008

Telephone: (614) 464-6334

Facsimile: (614) 719-5072

[tbpensyl@vorys.com](mailto:tbpensyl@vorys.com)

[mjball@vorys.com](mailto:mjball@vorys.com)

*Attorneys for Defendants Polekatz Gentleman's Club, LLC and Stephen Dabrowski*